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**REMARKS**

Claims 1-46 are currently pending in the subject application and are presently under consideration. An amendment to the specification that corrects minor informalities is found at page 2. A clean version of all pending claims is found at pages 3-13. Claims 1, 3, 4, 14, 18, 26, 27, 35, 40, 41, and 43 have been amended herein. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

**I. Rejection of Claims 3, 18, 26, 27, 40, and 43 Under 35 U.S.C. §112**

Claims 3, 18, 26, 27, 40, and 43 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out, distinctly claim, and specifically set forth the subject matter which Applicant regards as the invention. Claim 18 has been amended to specify "claim 14" as a parent claim. Claims 3, 26, 27, 40, and 43 have been amended to remove "without requiring significant interaction from a user." It is respectfully submitted that these rejections should be withdrawn in view of the herein amendments to claims 3, 18, 26, 27, 40, and 43.

**II. Objection to Claim 7 Under CFR 1.75(c)**

Claim 7 stands objected to under 37 CFR 1.75(c), as being of improper dependent form for failing to further limit the subject matter of a previous claim. It is respectfully submitted that this objection should be withdrawn for at least the following reasons. Claim 7 further limits the subject matter of claim 5.

In particular, claim 5 recites transmitting the peripheral device settings from the server to the client *together with* the configuration information, while claim 7 provides further limitation by stating that the peripheral device settings are transmitted *contemporaneously* with the configuration information. Webster's Revised Unabridged Dictionary defines *together with* as "in company or association with respect to place or time" and *contemporaneously* as "at the same time with some other event." Thus, claim 7 further limits claim 4. Withdrawal of this objection is respectfully requested.

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### III. Objection to Claims 1-46 Under CFR 1.75(a)

Claims 1-46 stand objected to under 37 CFR 1.75(a), for using specific words as known in the art contradictory to known and accepted meanings, resulting in confusion of the claimed invention. However, contrary to contentions in the Office Action, the terms "clients" and "servers" as utilized in the subject application are consistent with known and accepted meanings. The meanings of the terms are exemplified by the specification, which states, for example, that *the server transmits display information to the client for display at the client, and user inputs ... at the client are transmitted to the server for processing by an application(s) executing at the server.* (See pg. 1, ln. 9-12). The meanings are consistent with definitions stated in the Office Action; in particular, clients are "computing terminal(s) and associated process(es) which requested some network service" and servers are "computing terminals and associated process(es) which provided a service in response to a client request." (See Office Action dated June 5, 2003, pg. 3-4).

Additionally, the Office Action contends that claim 1 recites "'a system having a server and a client' which describes installation of a peripheral device (server) at a [network] client [terminal], installing 'server support' in a non-specified location." However, such statements are mistaken since the peripheral device is, for example, a printer, and not a server. (See pg. 4, ln. 10). Furthermore, in view of claims 1 and 14 which have been amended for purposes of clarity, server support is installed *on the server*. Thus, withdrawal of this objection is respectfully requested.

### IV. Rejection of Claims 1-3, 5-10, 12-23, 25-31, 33-40, and 42-45 Under 35 U.S.C. §102(b)

Claims 1-3, 5-10, 12-23, 25-31, 33-40, and 42-45 stand rejected under 35 U.S.C. §102(b) as being clearly anticipated by Golson *et al.* (U.S. 5,761,505). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Golson *et al.* does not teach or suggest each and every element recited in the respective claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that "each and every element as set forth in the claim is found, either expressly or inherently described, in a

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single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

7 The subject invention as claimed relates to a server-client system in which system configuration information for a server is stored on a client. In particular, independent claim 1 (and similarly independent claims 14, 19, 25, 33, 36, and 42) recites *transmitting server support configuration information related to the peripheral device from the server to the client*. It is readily apparent that Golson *et al.* does not teach or suggest such aspects of applicants' claimed invention. Golson *et al.* simply teaches transmitting configuration tasks, which are instructions to add, delete or modify a resource object. (See col. 6, ln. 56-65). Thus, at best Golson *et al.* teaches transmitting instructions to a client, rather than transmitting *server support configuration information related to the peripheral device from the server to the client*. The subject invention as claimed provides for transmitting configuration information which includes, for example, data associated with print drivers, printer queues, printer settings, and I/O ports to which the printer is connected. (See pg. 9, ln. 20-23).

16 Additionally, Golson *et al.* fails to teach or suggest *storing the transmitted server support configuration information at the client* as recited in independent claims 1, 25, 36, and 42. Instead, Golson *et al.* teaches away by disclosing a *global* resource data base that maintains a plurality of resource objects. (See col. 5, ln. 58-60). The *global* resource data base is contained *within the nonvolatile global memory*. (See Fig. 1). Thus, the configuration information is stored globally. The subject invention, however, stores configuration information *at the client* and therefore, the configuration information is readily available at the client in the event that the configuration information is needed to be restored on the server. (See pg. 10, ln. 1-2).

19 In view of at least the above, it is readily apparent that Golson *et al.* does not anticipate or suggest the subject invention as recited in claims 1, 14, 19, 25, 33, 36, and 42 (and claims 2-3, 5-10, 12-13, 15-18, 20-23, 26-31, 34-40, and 43-45 which respectively depend there from). This rejection should be withdrawn.

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V. Rejection of Claims 1, 8, 12-14, 17, 19, 23, 25, 30, 33, 34, 36, 42, and 45 Under 35 U.S.C. §102(e)

Claims 1, 8, 12-14, 17, 19, 23, 25, 30, 33, 34, 36, 42, and 45 stand rejected under 35 U.S.C. §102(e) as being clearly anticipated by Lomas *et al.* (U.S. 6,424,424). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Lomas *et al.* does not teach or suggest each and every element recited in the respective claims.

In particular, independent claim 1 (and similarly claims 14, 19, 25, 33, 36, and 42) recites installing server support on the server for a *peripheral device attached at the client*. It is readily apparent that Lomas *et al.* does not teach or suggest such aspects of the applicants' claimed invention. Lomas *et al.* merely teaches installation of a network printer onto a client. As shown in Figure 1, the printer 12 is attached to the network 10, instead of the client 14. (See col. 2, ln. 37-42). The subject invention, on the contrary, states that the client includes memory, a processor, and an I/O port having a printer connected thereto. (See pg. 9, ln. 9-10). The claimed invention facilitates a user's ability to utilize a local *peripheral device attached at the client*; thus, for example, a local printer can be employed to print data generated by an application operating on the server. (See pg. 1, ln. 23-25).

Moreover, Lomas *et al.* does not teach or suggest *transmitting server support configuration information related to the peripheral device* as recited in claims 1, 14, 19, 25, 33, 36, and 42. Lomas *et al.* merely teaches transmitting a new printer executable installation program. (See col. 3, ln. 8-10). The new printer executable installation program facilitates *installing* of a printer *on a client*. (See col. 2, ln. 66- col. 3, ln. 34). The subject invention, however, transmits *server support configuration information*. Such information is utilized to *restore* the peripheral device *on the server*. (See pg. 10, ln. 1-5).

In view of at least the above, it is readily apparent that Lomas *et al.* does not anticipate or suggest the subject invention as recited in claims 1, 14, 19, 25, 33, 36, and 42 (and claims 8, 12-13, 17, 23, 30, 34, and 45 which respectively depend there from). This rejection should be withdrawn.

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**VI. Rejection of Claims 2-7, 18, 20-22, 26-29, 37-38, 40-41, and 43-44****Under 35 U.S.C. §103(a)**

Claims 2-7, 18, 20-22, 26-29, 37-38, 40-41, and 43-44 are rejected under 35 U.S.C. §103(a) as being unpatentable over Lomas *et al.* (U.S. 6,424,424) further in view of Yellepeddy *et al.* (U.S. 6,288,790). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Yellepeddy *et al.* does not make up for the aforementioned deficiencies of Lomas *et al.* with respect to independent claims 1, 14, 19, 25, 36, and 42 (which claims 2-7, 18, 20-22, 26-29, 37-38, 40-41, and 43-44 directly or indirectly depend from). In particular, Yellepeddy *et al.* does not teach or suggest installing server support on the server for a *peripheral device attached at the client*. Yellepeddy *et al.* merely teaches a technique for preserving a print queue initiated by a mobile client on the server when the mobile client disconnects from a server. (See col. 2, ln. 10-28). Therefore, the subject claims are not obvious over the combination of Lomas *et al.* and Yellepeddy *et al.* Accordingly, withdrawal of this rejection is respectfully requested.

**VII. Rejection of Claims 9, 10, 15, 16, 31, 35, and 39 Under 35 U.S.C. §103(a)**

Claims 9, 10, 15, 16, 31, 35, and 39 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Lomas *et al.* (U.S. 6,424,424) in view of Huang *et al.* (U.S. 6,131,134) further in view of White *et al.* (U.S. 6,301,012). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Huang *et al.* and/or White *et al.* do not make up for the aforementioned deficiencies of Lomas *et al.* with respect to independent claims 1, 14, 25, 33, and 36 (which claims 9, 10, 15, 16, 31, 35, and 39 directly or indirectly depend from). Huang *et al.* merely teaches a hot plug-and-play converter of a universal serial bus interface that converts a non-plug-and-play interface into a hot plug-and-play USB interface. (See abstract). White *et al.* merely teaches automatic configuration of a network printer. Therefore, the subject claims are not obvious over the combination of Lomas *et al.*, Huang *et al.* and White *et al.* Accordingly, withdrawal of this rejection is respectfully requested.

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**VIII. Rejection of Claims 11, 24, 32, and 46 Under 35 U.S.C. §103(a)**

Claims 11, 24, 32, and 46 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Lomas *et al.* (U.S. 6,424,424) in view of White *et al.* (U.S. 6,301,012). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. White *et al.* does not make up for the aforementioned deficiencies of Lomas *et al.* with respect to independent claims 1, 19, 25, and 42 (which claims 11, 24, 32, 46 directly or indirectly depend from). Therefore, the subject claims are not obvious over the combination of Lomas *et al.* and White *et al.* Accordingly, withdrawal of this rejection is respectfully requested.

**IX. Rejection of Claims 1-46 Under 35 U.S.C. §103(a)**

Claims 1-46 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Gase *et al.* (U.S. 5,580,177) in view of Urevig *et al.* (U.S. 6,154,787). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Gase *et al.* and Urevig *et al.*, alone and/or in combination, do not teach or suggest all the claim limitations set forth in the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, *the prior art reference (or references when combined) must teach or suggest all the claim limitations.* See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added).

As discussed *supra*, claims 1, 25, 36, and 42 recite *storing the transmitted server support configuration information at the client*. It is readily apparent that neither Gase

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*et al.* nor Urevig *et al.* teach or suggest such aspects of the applicants' claimed invention. Gase *et al.* discloses uploading a print driver into a printer/driver library which is part of the file server. (See Fig. 1; col. 4, ln. 27-35). Thus, the print driver is stored *at the server*, instead of *at the client*. Urevig *et al.* teaches utilizing a STDMM, which is a central coordinating facility. (See col. 6, ln. 27-53). Thus, Urevig *et al.* teaches storing information *at the server instead of at the client*. On the contrary, the subject invention stores the transmitted server support configuration information *at the client*. The applicants' invention facilitates restoring configuration information of a peripheral device on the server. (See pg. 10, ln. 1-5). Therefore, Gase *et al.* and Urevig *et al.* fail to teach or suggest such aspects of the applicants' claimed invention.

In view of at least the above, it is readily apparent that Gase *et al.* and Urevig *et al.*, alone and/or in combination, do not teach, suggest or disclose the subject invention as recited in claims 1, 14, 19, 25, 33, 36, and 42 (and claims 2-13, 15-18, 20-24, 26-32, 34-35, 37-41, and 43-46 which respectively depend there from). This rejection should be withdrawn.

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CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,

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